

### REMARKS

The present application was filed on March 31, 2004 with claims 1 through 21. Claims 1 through 21 are presently pending in the above-identified patent application. Claims 1, 10 and 19 are proposed to be amended.

In the Office Action, the Examiner rejected 1-5, 8-14 and 17-21 under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. The Examiner objected to claims 6-7 and 15-16 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

#### Section 101 Rejection

Claims 1-5, 8-14 and 17-21 were rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. The Examiner asserts that the claims merely recite the step of “processing said translated response ...” without any practical application being recited. To the contrary, however, the preamble of each independent claim clearly indicates that the invention *translates* a source language classification system *into* at least one target language. The claims expressly state that the source language classification system classifies a communication into one of a plurality of predefined categories.

In addition, each independent claim has been amended to emphasize that the claimed invention generates a natural language understanding module from the translated response repository. The claims expressly state that the natural language understanding module classifies a communication in the target language. Thus, a practical application is clearly recited.

The Examiner suggests that a “conversion” provides a safe harbor by requiring a physical act outside of a computer. FIG. 3 of the present application illustrates the present invention and emphasizes the translation of the various data that is processed and translated by the invention. In particular, a sample response repository 210 is initially *obtained* (the sample response repository 210 comprises a plurality of prior communications each having a classification). A mechanical *translation* process 310 is then applied to the sample response repository 210 to generate a translated response repository 315. Finally a natural language understanding module 350 is

*generated from* the translated response repository 315. The natural language understanding module 350 classifies a communication in the desired target language.

Applicants that all of the pending claims, as amended, are in full compliance with Section 101 and respectfully request the withdrawal of the rejection under 35 U.S.C. §101.

Conclusion

All of the pending claims following entry of the amendments, i.e., claims 1-21, are in condition for allowance and such favorable action is earnestly solicited

If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this application, the Examiner is invited to contact the undersigned at the telephone number indicated below.

The Examiner's attention to this matter is appreciated

Respectfully submitted,



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